

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

WILMINGTON SAVINGS FUND SOCIETY,
FSB, D/B/A CHRISTIANA TRUST, NOT
INDIVIDUALLY BUT AS TRUSTEE FOR
CARLSBAD FUNDING MORTGAGE
TRUST.

Plaintiff,

V.

BRENDA J. DUZAN; FIRST NATIONAL BANK OF OMAHA; ALSO ALL PERSONS OR PARTIES UNKNOWN CLAIMING ANY RIGHT, TITLE, LIEN, OR INTEREST IN THE PROPERTY DESCRIBED IN THE COMPLAINT HEREIN.

Defendants.

I. Nicolas Daluiso, declare:

1. I am a duly licensed attorney and attorney of record for WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR CARLSBAD FUNDING MORTGAGE TRUST, and make the Declaration based on personal knowledge.

DECLARATION OF DALUISO IN SUPPORT OF
PLAINTIFF'S MOTION TO REMAND - 1

60364-05071-LIT-WA

Law Offices
ROBINSON TAIT, P.S.

1 2. Defendant Brenda J. Duzan (hereinafter “Duzan”) was personally served a copy of the
2 Summons and Complaint on December 30, 2014.

3 3. Defendant Duzan filed a Notice of Appearance *pro se* on January 29, 2015.

4 4. On January 16, 2015, Defendant Duzan filed a Motion to Dismiss the Plaintiff’s
5 Complaint for lack of standing.

6 5. The court denied Defendant Duzan’s Motion to Dismiss on February 6, 2015.

7 6. On March , 2015, Defendant Duzan filed an Answer and Affirmative Defenses.

8 7. Defendant Duzan removed this matter to federal court on August 17, 2016, 595 days
9 after service of Defendant Duzan.

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13 *I declare under the penalty of perjury under the laws of the State of Washington that the*
14 *foregoing is true and correct.*

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17 DATED this 8th day of September, 2016, at Seattle, Washington.

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19 _____
20 /s/ Nicolas Daluiso
21 Nicolas Daluiso, WSB #23505
22 Attorney for Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2016, I electronically filed the foregoing DECLARATION OF NICOLAS DALUISO IN SUPPORT OF PLAINTIFF'S MOTION TO REMAND with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all parties as listed on the Notice of Electronic Filing.

I further certify that on September 8, 2016, in compliance with the notification requirements pursuant to the laws of the State of Washington, I caused to be deposited in the United States first class mail, postage pre-paid, copies of the foregoing DECLARATION OF NICOLAS DALUISO IN SUPPORT OF PLAINTIFF'S MOTION TO REMAND, addressed to each of the following:

Brenda J Duzan
17426 85TH AVE CT E
PUYALLUP, WA 98375
Pro Se

DATED this 8th day of September, 2016, at Seattle, Washington.

/s/ Natalie Quarnstrom
Natalie Quarnstrom
An employee of Robinson Tait, P.S.